

KAREN A. CONNOLLY, LTD.

Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767

KAREN A. CONNOLLY
KAREN A. CONNOLLY, LTD.
6600 W. Charleston Blvd., Ste. 124
Las Vegas, NV 89146
Telephone: (702) 678-6700
Facsimile: (702) 678-6767
E-Mail: advocate@kconnollylawyers.com
Attorney for Defendant, Russell Cates

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RUSSELL CATES,

Defendant.

CASE NO.: 2:20-mj-519-VCF

**RUSSELL CATES' UNOPPOSED
MOTION TO CONDUCT A PRE-PLEA
PRESENTENCING INVESTIGATION
REPORT AND PROPOSED ORDER**

COMES NOW the Defendant, RUSSELL CATES, by and through his attorney of record, KAREN A. CONNOLLY, of the law office of KAREN A. CONNOLLY, LTD., and hereby moves this Honorable Court to order that a Pre-Plea Pre-Sentence Investigation Report be prepared by the United States Department of Parole and Probation to determine Defendant's criminal history. Defendant has a number of priors. Counsel for defendant and Assistant United States Attorney JIM W. FANG, have been engaged in negotiation discussions. Defendant's criminal history score needs to be clarified to enable counsel to properly assess his exposure relative to any proposed plea agreement, specifically whether or not CATES is eligible for a Armed Career Criminal or Career Offender enhancement. In order to help facilitate a resolution to this matter, in the interests of judicial economy, it is respectfully requested that the United States Department of Parole and Probation be directed to prepare a pre-plea presentence investigation report as soon as possible.

DATED this 1st day of March, 2021.

/s/ Karen A. Connolly
KAREN A. CONNOLLY
Nevada Bar No. 4240
6600 W. Charleston Blvd. Suite 124
Las Vegas, Nevada 89102-1846
Attorney for Defendant, Russell Cates

1 KAREN A. CONNOLLY
2 **KAREN A. CONNOLLY, LTD.**
3 6600 W. Charleston Blvd., Ste. 124
4 Las Vegas, NV 89146
5 Telephone: (702) 678-6700
6 Facsimile: (702) 678-6767
7 E-Mail: advocate@kconnollylawyers.com
8 *Attorney for Defendant, Russell Cates*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RUSSEL CATES,

Defendant.

CASE NO.: 2:20-mj-519-VCF

ORDER

IT IS HEREBY ORDERED that the Probation Department will prepare a Pre-Sentence Investigation Report on Defendant RUSSELL CATES.

DATED this the 11th day of March, 2021.



U.S. MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

It is hereby certified that service of the above and foregoing UNOPPOSED MOTION TO CONDUCT A PRE-PLEA PRESENTENCING INVESTIGATION REPORT was made through the Court's electronic filing and notice system (CM/ECF) which will send a notice of electronic filing to all parties via electronic filing.

Dated this 1st day of March 2021.

/s/ Shaeley Foster
Employee of Karen A. Connolly, LTD.

KAREN A. CONNOLLY, LTD.
Karen A. Connolly
6600 W. Charleston Blvd., Ste. 124, Las Vegas, Nevada 89146
Telephone: (702) 678-6700 Facsimile: (702) 678-6767